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Via Courier

July 8, 1992

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

ORIGINAL
FILE

Re: ET Docket 92-9 - Notice of Proposed Rule Making

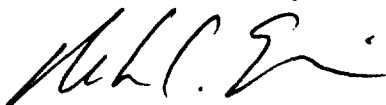
Dear Ms. Searcy:

Enclosed please find ten (10) copies of the Reply Comments of Primestar Partners, L.P. for filing in the above referenced docket. I would request that the Chairman and member of the Commission be provided with copies of this pleading.

Additionally, I would ask that one copy be date stamped and returned to me in the enclosed, self-addressed envelope.

Your cooperation in this matter is appreciated.

Sincerely,



Mark C. Ellison
Counsel for
Primestar Partners L.P.

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Before the
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Redevelopment of Spectrum to)	ET Docket No. 92-9
Encourage Innovation in the)	
Use of New Telecommunications)	
Technologies)	

REPLY COMMENTS OF PRIMESTAR PARTNERS L.P.

Primestar Partners L.P. (Primestar) submits the following reply comments in the above referenced proceeding. For the reasons specified herein, Primestar urges that the Commission act to protect the frequency of 11.7 - 12.2 GHz and remove that frequency from consideration for the reallocation of microwave services as contemplated in this Notice of Proposed Rule Making.

Primestar is a satellite carrier delivering eleven channels of video programming, as well as stereo digital radio, teletext, data and value added services directly to subscribing private individual households utilizing relatively small (approximately three foot diameter) satellite dishes and related receiving equipment. Under an agreement entered into in February 1990, Primestar uses eleven transponders on Satcom K-1 operated by G.E. American Communications, Inc. and holds options for additional transponders which it may elect to use in the future. Satcom K-1 is a 45 watt Ku-band satellite located at 85 degrees west and operating in the 11.7 - 12.2 GHz band designated for fixed satellite service (FSS).

At the present time, the Primestar service is the only operational (and growing) Ku-band, direct-to-home television service available in the United States. The service can provide new viewing opportunities or interesting alternatives in virtually all households in the continental United States. Primestar, through its distributors, offers households in rural areas and small towns their first chance to enjoy expanded access to multi-channel television programming. In cable-wired areas, Primestar provides new options and, in many cases, the first opportunity to access pay-per-view movies, sports, and other events.

The Commission's plan to reallocate 220 MHz to accommodate emerging telecommunications technologies is commendable. However, to the extent fixed microwave operations currently licensed in the 1.85 - 2.20 GHz spectrum move to 11.7 - 12.2 GHz, the downlink frequency band for Ku-band domestic satellites, the likelihood for materially unresolvable interference and coordination problems with PRIMESTAR's present and future operations significantly increases. The operational difficulties of running a national, multi-channel direct-to-home service are already abundant. The potential introduction of literally tens of thousands of microwave operations into the spectrum used by Primestar would materially and unreasonably complicate those difficulties and inhibit its future development.

Emerging technologies such as personal communications services, digital audio broadcasting and mobile satellite services as well as others can hold great potential. However, direct-to-home video, audio and text service such as PRIMESTAR's in operation and growing *today* is of real value and importance. While the emerging technologies addressed in this proceeding are important and exciting, the ability to

bring vastly improved and expanded television services *today* is also of great importance and in the public interest.

In conclusion, we do not believe that existing service providers should be placed in circumstances where spectrum is reallocated for *potential* services to the likely material detriment of *existing* service providers. We urge the Commission to reconsider and reverse its preliminary inclusion of the 11.7 - 12.2 GHz band as one of the frequencies available for the proposed reallocation.

Respectively submitted,



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